

NOTICE INVITING WRITTEN PUBLIC COMMENT

NOTICE is hereby given that the Bay Area Air Quality Management District (District) has issued a Draft Engineering Evaluation Report for a project to add “black start” capability at the **Marsh Landing Generating Station** (District Facility # B9169), a power plant owned by Marsh Landing LLC and operated by a subsidiary of NRG Energy, Inc. (NRG) located at **3201 Wilbur Avenue, Antioch, CA 94509**. The District is preparing this Engineering Evaluation Report for use by the California Energy Commission (CEC) in reviewing NRG’s application for an amendment to its CEC license to implement this project (CEC Docket No. 08-AFC-03C). The Engineering Evaluation Report addresses how the project will comply with applicable air quality laws and regulations. The District has issued the Engineering Evaluation Report in draft form to give interested members of the public an opportunity to review and comment on it before the District submits it to the CEC

The black start capability project will involve installing a battery system to allow the facility to start up and begin operating without external assistance from the electrical grid. Adding this black start capability is essential to ensure that grid power can be restored quickly in the event of a regional system outage. In the event of a black start emergency, the battery system would be used to start up the plant from an offline condition. Following instructions from the California Independent System Operator (CAISO) or PG&E, two of the four turbines at the facility would be required to operate at no load or low load (less than 60%) as grid power is being restored. As the system begins to recover fully, the CAISO would order the turbines to increase to base load (at or greater than 60%), which is their normal operating scenario.

Operating the turbines at no load or low load during black-start-related operations will result in a decrease in emissions of some pollutants compared to the plant’s normal operations, but it will result in a short-term increase in emissions of oxides of nitrogen (NO_x), carbon monoxide (CO) and precursor organic compounds (POC) until the turbines reach normal load. Therefore, NRG is requesting separate emissions limits to be applicable during black-start-related operations to allow the facility to engage in these operations. If and when the CEC approves these limits, the District will incorporate them into NRG’s air permit. NRG has applied to have these conditions incorporated into its air permit under District Application No. 29169.

The Draft Engineering Evaluation Report documents how the Marsh Landing black start capability project will comply with applicable air quality regulatory requirements. The District invites interested members of the public to review the Draft Engineering Evaluation Report and provide comments on it. The District will consider any comments received in preparing a final Engineering Evaluation Report for use by the CEC in reviewing NRG’s application. The CEC will hold a public hearing to consider these issues. Members of the public may also request that the District hold a public hearing if they can demonstrate that doing so would substantially increase public participation in the decision-making process.

The Draft Engineering Evaluation Report and all supporting documentation are available for public inspection at District headquarters at 375 Beale Street, Suite 600, San Francisco, CA, 94105. The Draft Engineering Evaluation Report may also be viewed on the District web page at www.baaqmd.gov/permits/public-notice. Written comments on the Draft Engineering Evaluation and any public hearing request should be directed to Xuna Cai, Bay Area Air Quality Management District, 375 Beale Street, Suite 600, San Francisco, CA 94105, or by e-mail to xcai@baaqmd.gov, and must be received no later than **January 31, 2019**. Any request for information should be directed to Xuna Cai at the above addresses or by telephone at (415) 749-4788.